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2 The Honorable Barbara J. Rothstein  
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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

11 IN RE SUBPOENA TO  
12 JIMMY NGUYEN

Case No. 2:20-cv-00593-BJR

13 IRA KLEIMAN, as the personal  
14 representative of the Estate of David  
15 Kleiman, and W&K Info Defense Research,  
16 LLC,

**SECOND DECLARATION OF  
VELVEL (DEVIN) FREEDMAN IN  
SUPPORT OF PLAINTIFFS' SECOND  
MOTION TO COMPEL**

17 Plaintiffs,

18 v.

19 CRAIG WRIGHT,

20 Defendant.

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24 SECOND DECLARATION OF FREEDMAN  
(Case No. 2:20-cv-00593-BJR)

ROCHE CYRULNIK FREEDMAN LLP  
200 S BISCAYNE BLVD., SUITE 5500  
MIAMI, FL 33131  
TEL.: (305) 753-3675

## DECLARATION

1. I am an attorney for Plaintiffs Ira Kleiman, as the personal representative of the Estate of David Kleiman, and W&K Info Defense Research, LLC (collectively, “Plaintiffs”). I am admitted to practice in the U.S. Supreme Court, Florida, District of Columbia, U.S. Courts of Appeals for the Ninth and Eleventh Circuits, and all U.S. District Courts in Florida.

2. I am over the age of eighteen. The statements in this declaration are based on my personal knowledge and they are true and accurate to the best of my knowledge and belief. I make this declaration in support of Plaintiffs' Second Motion to Compel.

3. On April 30, 2020, I deposed Mr. Nguyen. That deposition lasted for 5 hours and 32 minutes on the record.

4. Attached hereto as Exhibit 1 is an email that I received from Dr. Wright's attorney on May 1, 2020. Mr. Nguyen's attorneys were copied on this email.

5. Attached hereto as Exhibit 2 is a true and correct copy of Order on Plaintiffs' Motion to Compel, *Ira Kleiman et al. v. Craig Wright*, No. 9:18-cv-80176-BB (S.D. Fla. Aug. 27, 2019), ECF No. 277.

6. Attached hereto as Exhibit 3 is a true and correct copy of Order on Discovery, *Ira Kleiman et al. v. Craig Wright*, No. 9:18-cv-80176-BB (S.D. Fla. Mar. 9, 2020), ECF No. 420.

7. Attached hereto as Exhibit 4 is a true and correct copy of an excerpt from Reply to Defence, *Craig Wright v. Peter McCormack*, Claim No. QB-2019-001430 (EWHC (QB) Oct. 11, 2019).

8. Attached hereto as Exhibit 5 is a true and correct copy of an excerpt from Amended Particulars of Claim, *Craig Wright v. Peter McCormack*, Claim No. QB-2019-001430 (EWHC (QB) Dec. 19, 2019).

1 I declare the foregoing statements to be true under the penalties of perjury.  
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Dated: May 8, 2020

/s/ *Velvel (Devin) Freedman*

Velvel (Devin) Freedman, Esq.

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on May 8, 2020, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF.

/s/ Emanuel Jacobowitz  
Emanuel Jacobowitz, WSBA #39991